



National Association of Broadcasters  
Television and Radio Political Action Committee

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April 5, 2001

Mr. Donald L. Averett  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20540

**RE: Television and Radio Political Action Committee (#C00009985)**

Dear Mr. Averett:

This letter is in response to the Federal Election Commission's letter of March 21, 2001 to the Television and Radio Political Action Committee regarding two "earmarked" contributions that were disclosed on TARPAC's October, 2000 Monthly Report (for the period from 9/1/00 through 9/30/01). The two "earmarked" contributions mentioned in the Commission's letter were those of Mr. John Knebel, to the U.S. Senate primary election campaign of former Congressman Rick Lazio, and of Mr. Ben Reed, to the general election campaign of Congressman Henry Bonilla.

(a) For your information, Mr. Knebel is an employee of the National Association of Broadcasters and regularly contributes to TARPAC through a pay-roll deduction plan. Between January 1, 2000 and September 11, 2000, Mr. Knebel contributed \$1,458.38 to TARPAC (see the attached accounting summary of Mr. Knebel's contributions to TARPAC for calendar year 2000). On September 11, 2000, Mr. Knebel notified the TARPAC administrator that he wanted to " earmark " \$1,000.00 from his 2000 year-to-date TARPAC contribution of \$1,458.38 to the Lazio campaign. The TARPAC administrator then confirmed with the Commission's staff, specifically Jeff Chumley and with TARPAC's outside counsel, that such an " earmark " request was appropriate and could be accomplished since the amount of the requested " earmark " contribution was less than the total amount contributed by Mr. Knebel to TARPAC since January 1, 2000. The " earmarked " Knebel contribution was thereafter duly and timely forwarded to the Lazio committee on September 11, 2000 with a notation to the Lazio campaign that the contribution had been " conducted " by TARPAC at the specific request of Mr. Knebel.

Mr. Knebel's monthly contribution to TARPAC of \$208.34, which was effectuated via payroll deduction, has been duly reported throughout the calendar year 2000 to the Commission on Schedule "A" of TARPAC's monthly reports of receipts and disbursements. In addition, Mr. Knebel's " earmarked " contribution on TARPAC's October 2000 report showing that a check in that amount had been disbursed to the Lazio campaign pursuant to Mr. Knebel's instructions. As indicated, Mr. Knebel was regularly contributing \$208.34 to TARPAC throughout the months of calendar year 2000, but only notified TARPAC on September 11, 2000 of his request to " earmark " \$1,000.00 of his year-to-date TARPAC contribution to the Lazio campaign. Given this factual predicate, TARPAC is unclear how it is

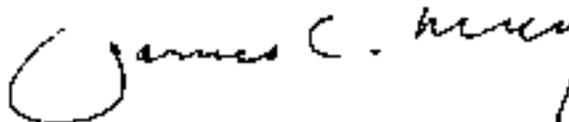
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supposed to report, on its monthly 2000 Schedule A's, the receipt of contributions from Mr. Knebel during the first eight months of 2000 that were only directed by Mr. Knebel to be earmarked in September 2000. If our monthly reports of TARPAC receipts from Mr. Knebel must now be amended, which reports must be amended and what will the amendments reflect? TARPAC seeks the guidance of the Commission regarding exactly how TARPAC, in an instance such as this, is to report this activity.

(b) Mr. Ben Reed is a member of the NAB and regularly contributes to TARPAC via a personal check. From January 1, 2000 through September 1, 2000, Mr. Reed contributed a total of \$200.00 to TARPAC and the receipt of Mr. Reed's contributions was duly disclosed to the Commission in TARPAC's monthly reports during the calendar year 2000. On September 16, 2000 a check to TARPAC, as well as his \$200.00 year-to-date contributions, previously made to TARPAC during 2000, were to be "earmarked" in their entirety by TARPAC for the general election campaign of Congressman Henry Bonilla. Mr. Reed's check and note of September 16, 2000 were received by TARPAC on September 21, 2000. On September 27, 2000 TARPAC timely forwarded a check in the amount of \$300.00 to the Bonilla campaign, noting that the contribution had been "earmarked" by Mr. Reed.

The factual predicate presented by the contributions to TARPAC by Mr. Reed is nearly identical to the payroll deduction contributions made by Mr. Knebel to TARPAC over the course of the calendar year 2000. As a consequence, TARPAC is unclear as to how it is to report Mr. Reed's contributions to TARPAC as being earmarked by Mr. Reed to the Bonilla campaign, when Mr. Reed only informed TARPAC on September 16, 2000 of his decision to earmark all of his year-to-date TARPAC contributions to the Bonilla campaign. Again, we seek the guidance of the Commission in this instance.

Sincerely,



James C. May  
Executive Vice President  
Treasurer, TARPAC

JCM:ak  
Attachments

ASS\_ID=[GR931704] = 59 Total = 17,794 Optimization Level - Full

Donor Name	Amount	Date
Knebel, John	208.00	04/02/1998
Knebel, John	208.00	05/15/1998
Knebel, John	208.00	06/03/1998
Knebel, John	208.00	07/23/1998
Knebel, John	308.00	08/04/1998
Knebel, John	308.00	09/15/1998
Knebel, John	308.00	10/09/1998
Knebel, John	308.00	11/05/1998
Knebel, John	308.00	12/03/1998
Knebel, John	308.00	12/31/1998
Knebel, John	200.00	01/31/2000
Knebel, John	8.34	01/31/2000
Knebel, John	200.00	02/29/2000
Knebel, John	8.34	02/29/2000
Knebel, John	200.00	03/31/2000
Knebel, John	8.34	03/31/2000
Knebel, John	200.00	04/26/2000
Knebel, John	8.34	04/26/2000
Knebel, John	200.00	06/01/2000
Knebel, John	8.34	06/01/2000
Knebel, John	208.34	06/30/2000
Knebel, John	208.34	07/27/2000
Knebel, John	208.34	09/12/2000
Knebel, John	208.34	09/30/2000
Knebel, John	208.34	10/31/2000
Knebel, John	208.34	11/30/2000
Knebel, John	208.26	12/31/2000
Knebel, John	208.34	01/31/2001
Knebel, John	208.34	03/02/2001



Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
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